

Count 0

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT DELAWARE**

ROBERT E. BROWN, and
SHIRLEY H. BROWN,

Plaintiffs,

v.

INTERBAY FUNDING, LLC, and
LEGRECA & QUINN REAL ESTATE
SERVICES, INC.,
Defendants.

C.A. No. 04-6 17 SLR

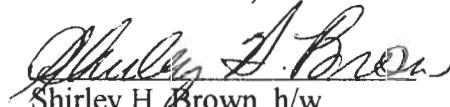
FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2005 MAR -4 AM 10:20

ADDENDUM

**PLAINTIFFS MOTION TO COMPEL DEFENDANTS (INTER BAY FUNDING
AND LEGRECA AND QUINN) TO RESPOND TO INTERROGATORIES
PERSUANT TO FEDERAL RULES OF CIVIL PROCEDURE RULE 37.(C)
(SANCTIONS).**

Comes now, Robert E. and Shirley H. Brown, and Certifies to this Honorable Court that the Plaintiffs in the above caption have made known to the Defendants (Interbay Funding LLC and Legreca and Quinn) through submission of Supplemental Interrogatories pursuant to Federal Rules of Civil Procedure Rule 37, that their answers to the original set of Interrogatories failed to meet the standards laid down in Federal Rules of Civil Procedure Rule 33. The submission of the Supplemental Interrogatories were met with the same results as the first, in that they (Interbay and Legreca and Quinn) have failed to participate in this process. Defendants' responses are vague, deviant, incomprehensible, perplexing, difficult, complicated, and uncooperative.


Robert E. Brown, Pro Se.


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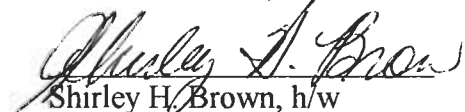
CERTIFICATION

THEREFORE, Plaintiffs Certify to this Honorable Court on this 3rd day of March 2005, that they have complied with the Federal Rules of Civil Procedure Rule 37 and that notice was provided to the Defendants (Interbay and Legreca and Quinn) of their failure to participate in the Discovery Process pursuant to Federal Rule Civil Procedure Rule 33, written Interrogatories. Plaintiffs further Certify to this Honorable Court that Supplemental Interrogatories pursuant to Federal Rule of Civil Procedure Rule 37 were submitted thereafter to the Defendants. Again, the Defendants failed to participate or cooperate in their answers to the Supplemental Interrogatories. Defendants' responses to the Supplemental Interrogatories were vague, deviant, incomprehensible, perplexing, difficult, complicated, and uncooperative.

(c) Failure to Disclose; False or Misleading Disclosure; Refusal to Admit.

(1) A party that without substantial justification fails to disclose information required by Rule 26(a) or 26(e)(1) shall not, unless such failure is harmless, be permitted to use as evidence at a trial, at a hearing, or on a motion any witness or information not so disclosed. In addition to or in lieu of this sanction, the court, on motion and after affording an opportunity to be heard, may impose other appropriate sanctions. In addition to requiring payment of reasonable expenses, including attorney's fees, caused by the failure, these sanctions may include any of the actions authorized under subparagraphs (A), (B), and (C) of subdivision (b)(2) of this rule and may include informing the jury of the failure to make the disclosure.


Robert E. Brown, Pro Se.


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IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

Robert E. Brown and	:	
Shirley H. Brown h/w	:	
Plaintiffs,	:	
v.	:	Civil Action No. 04- 617- SLR
	:	
Interbay Funding LLC, and	:	
Legreca & Quinn Real Estate	:	
Services Inc.	:	
Defendants	:	

ADDENDUM


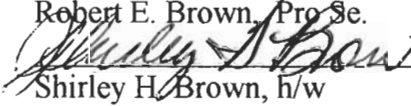
**PLAINTIFFS MOTION TO COMPEL DEFENDANTS (INTER BAY FUNDING
AND LEGRECA AND QUINN) TO RESPOND TO INTERROGATORIES
PERSUANT TO FEDERAL RULES OF CIVIL PROCEDURE RULE 37.(C)
(SANCTIONS).**

This is to certify that on this 3rd day March , 2005, copies of Addendum to
Plaintiffs Motion to Compel Defendants Interbay Funding LLC and Legreca and Quinn,
(copy of Certification) to respond to Interrogatories were served, on:

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Attorney's for Interbay

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